

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

NANCY R., pseudonymously, )  
)  
Plaintiff, )  
v. )  
)  
PLAZA HOTELS, LLC; STEVE )  
KETTER; MICHAEL WILEY; OKC )  
AIRPORT ES, LLC; ESH )  
STRATEGIES FRANCHISE, LLC; )  
KAJAL HOSPITALITY, LLC; )  
JALIYAN HOSPITALITY, INC.; )  
SUPER 8 WORLDWIDE, INC.; RAJ )  
KRUPA HOTEL, LLC; DAYS INNS )  
WORLDWIDE, INC.; CHAND & )  
SAAJ HOSPITALITY, INC.; )  
RAMADA WORLDWIDE, INC.; )  
YASH ENTERPRISES, INC.; )  
HOWARD JOHNSON )  
INTERNATIONAL, INC.; NOOR )  
HOTEL, LLC; AMBICA, LLC; OM, )  
LLC; INDRA, LLC; AND G6 )  
HOSPITALITY FRANCHISING, )  
LLC, )  
)  
Defendants. )

No. 5:25-cv-00462-G

---

**ESH STRATEGIES FRANCHISE, LLC’S MOTION TO DISMISS  
PLAINTIFF’S PETITION**

Defendant ESH Strategies Franchise, LLC (“ESH”), by and through its undersigned counsel, and pursuant to Fed. R. Civ. P. 12(b)(6), respectfully moves this Court for an order dismissing Plaintiff’s Petition (the “Complaint”), with prejudice, for failure to state a claim. A brief in support is attached hereto.

Respectfully submitted this 14<sup>th</sup> day of May, 2025.

Respectfully submitted,

**STEIDLEY & NEAL, P.L.L.C.**

s/ Charles D. Neal, Jr.

Charles D. Neal, Jr., OBA #6591

[cdn@steidley-neal.com](mailto:cdn@steidley-neal.com)

Philard L. Rounds, Jr., OBA #7780

[plr@steidley-neal.com](mailto:plr@steidley-neal.com)

Jamie A. Rogers, OBA #19927

[jar@steidley-neal.com](mailto:jar@steidley-neal.com)

CityPlex Towers, 53<sup>rd</sup> Floor

2448 East 81<sup>st</sup> Street

Tulsa, Oklahoma 74137

(918) 664-4612 telephone

(918) 664-4133 facsimile

And

**WEINBERG, WHEELER, HUDGINS,  
GUNN & DIAL**

Patrick B. Moore

*(Pro Hac Vice forthcoming)*

Georgia Bar No. 520390

Shubhra R. Mashelkar

Georgia Bar No. 475388

*(Pro Hac Vice forthcoming)*

Michael W. Warner

Georgia Bar No. 751362

*(Pro Hac Vice forthcoming)*

3344 Peachtree Rd. NE, Suite 2400

Atlanta, Georgia 30326

404-876-2700 | 404-875-9433 (fax)

[PMoore@wwhgd.com](mailto:PMoore@wwhgd.com)

[SMashelkar@wwhgd.com](mailto:SMashelkar@wwhgd.com)

[Cbyrd@wwhgd.com](mailto:Cbyrd@wwhgd.com)

[Mwarner@wwhgd.com](mailto:Mwarner@wwhgd.com)

*Counsel for ESH Strategies Franchise, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 14, 2025, I electronically transmitted the attached document to the Clerk of Court using the Electronic Case Filing System for filing.

Fletcher D. Handley, Jr.  
THE HANDLEY LAW CENTER  
[fdh@handleylaw.com](mailto:fdh@handleylaw.com)  
*Counsel for Plaintiff*

Michael C. Kane  
Joel Hengstler  
Bradley J. Myers  
[service@the702firm.com](mailto:service@the702firm.com)  
*Counsel for Plaintiff*

Geoffrey C. Parker  
Jonathan Hilton  
[gparker@hiltonparker.com](mailto:gparker@hiltonparker.com)  
[jhilton@hiltonparker.com](mailto:jhilton@hiltonparker.com)  
*Counsel for Plaintiff*

David C. Senger  
Hunter M. Siex  
COFFEY, SENGER & WOODARD PLLC  
[david@cswlawgroup.com](mailto:david@cswlawgroup.com)  
[hunter@cswlawgroup.com](mailto:hunter@cswlawgroup.com)  
*Counsel for Defendant Jaliyan Hospitality*

Bart Jay Robey  
Eric A. Moen  
Abby R. Herren  
CHUBBUCK DUNCAN & ROBEY, P.C.  
[eamoen@chubbucklaw.com](mailto:eamoen@chubbucklaw.com)  
*Counsel for Defendant OKC Airport ES*

Michael S. Linscott  
DOERNER, SAUNDERS, DANIEL & ANDERSON  
[mlinscott@dsda.com](mailto:mlinscott@dsda.com)

Kaylee Davis-Maddy  
DOERNER, SAUNDERS, DANIEL & ANDERSON  
[kmaddy@dsda.com](mailto:kmaddy@dsda.com)  
*Counsel for Super 8 Worldwide, Days Inns Worldwide, Ramada Worldwide, & Howard Johnson International*

Robert Glenn Chadwick, Jr.  
Alexander Gebert  
FREEMAN MATHIS & GARY, LLP  
[bob.chadwick@fmglaw.com](mailto:bob.chadwick@fmglaw.com)  
[alex.gebert@fmglaw.com](mailto:alex.gebert@fmglaw.com)  
*Counsel for Raj Krupa Hotel, LLC*

I hereby certify that on May 14, 2025 I filed the attached document with the Clerk of the Court and served the attached document by on the following, who are not registered participants of the ECF System:

PLAZA HOTELS, LLC  
3200 S 1-35 Service Road  
Oklahoma City, OK 73129

INDRA, LLC  
c/o Ramesh Patel  
11935 N. 1-35 Service Rd.  
Oklahoma City, OK 73131

KAJAL HOSPITALITY, LLC  
c/o Jaydip Modi  
1120 S 10<sup>th</sup> St.  
Clinton, OK 73601

NOOR HOTEL, LLC  
c/o Abdel Jawabreh  
3213 Meadow Lane  
Edmond, OK 73103

AMBICA, LLC  
c/o Prakash Patel  
5608 NW 107thSt.  
Oklahoma City, OK 73162

Michael A. Wiley  
1701 Wildhorse Dr.  
Edmond, OK 73003

Jonathan Wilfong  
OYO HOTELS, INC.  
440 Louisiana Street, Suite 1050  
Houston, TX 77002  
*Attorney for G6 Hospitality Franchising*

CHAND & SAAJ HOSPITALITY, INC.  
c/o Hitesh Patel  
2200 S. Meridian  
Oklahoma City, OK 73108

YASH ENTERPRISES, INC.  
c/o Tushar Natha  
400 S. Meridian  
Oklahoma City, OK 73108

OM, LLC  
c/o Ramesh V. Patel  
12001 N I-35 Service Road  
Oklahoma City, OK 73131

Steve Keller  
5101 S. Choctaw Ave.  
El Reno, OK 73036

*s/ Charles D. Neal, Jr.*

Charles D. Neal, Jr.  
Steidley & Neal, P.L.L.C.